

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KAELI GARNER, <i>et al.</i> ,)	Case No. 2:21-cv-00750-RSL
)	
Plaintiffs,)	JOINT MOTION AND ORDER TO
)	MODIFY CLASS CERTIFICATION
v.)	BRIEFING DEADLINES
)	
AMAZON.COM, INC., a Delaware)	
Corporation, and AMAZON.COM SERVICES)	
LLC, a Delaware Limited Liability Company,)	
)	
Defendants.)	

Plaintiffs and Defendants, by and through their undersigned counsel, hereby stipulate to the following:

WHEREAS, this is a putative nationwide data privacy class action lawsuit.

WHEREAS, on November 17, 2021, Plaintiffs filed the Amended Consolidated Class Action Complaint against Defendants.

WHEREAS, the Parties have engaged in extensive discovery, including document requests, interrogatories, discovery dispute conferences, motions to compel, and roughly twenty depositions to date.

WHEREAS, fact discovery closed on February 27, 2024.

WHEREAS, the Parties have jointly agreed to schedule the deposition of Defendants' corporate designee(s) after the close of fact discovery to be completed by April 26, 2024.

WHEREAS, the Parties have cooperatively discussed the need for an extension of class certification briefing and related expert report deadlines.

WHEREAS, the Parties agreed that there will be no additional discovery requests issued by either side.

WHEREAS, the Parties agreed that there will be no additional discovery-related motion practice, including as to Rule 30(b)(6) topics, by either side, beyond what has already been filed and is pending.

WHEREAS, this stipulation memorializes the Parties' agreement to extend the deadline for Plaintiffs' motion for class certification and the parties' expert reports.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the undersigned Parties, and respectfully submitted for the Court's approval, that the deadlines related to Plaintiffs' motion for class certification be extended as follows:

Event	Current Deadline	Proposed Deadline
Last day to file motion for class certification (including expert report in support of class certification)	April 19, 2024	June 18, 2024
Last day to file opposition to class certification (including expert report in opposition to class certification)	June 26, 2024	September 16, 2024
Last day to file reply in support of class certification (including reply class certification expert report limited to any new subjects introduced in opposition report)	July 26, 2024	October 31, 2024

Further, the parties agree that there will be no additional fact discovery or discovery-related motions.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: March 19, 2024

/s/ Bradley S. Keller

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JOINT MOTION AND ORDER TO MODIFY CLASS CERTIFICATION BRIEFING DEADLINES

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Dated: March 19, 2024

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ORDER

Pursuant to the Parties' Stipulated Motion to Modify Class Certification Briefing Deadlines, it is HEREBY ORDERED that the case schedule shall be modified as follows:

Event	Current Deadline	Proposed Deadline
Last day to file motion for class certification (including expert report in support of class certification)	April 19, 2024	June 18, 2024
Last day to file opposition to class certification (including expert report in opposition to class certification)	June 26, 2024	September 16, 2024
Last day to file reply in support of class certification (including reply class certification expert report limited to any new subjects introduced in opposition report)	July 26, 2024	October 31, 2024

It is further ORDERED that there will be no additional fact discovery or discovery-related motions.

Dated this 20th day of March, 2024.



Robert S. Lasnik
United States District Judge